

## REMARKS/ARGUMENTS

The application has been carefully reconsidered in view of the Final Office Action of May 9, 2005. Applicant offers the following remarks in support of allowance, as directed to Examiner's specific rejections.

Claim 1 has been amended to include additional distinctive features of the invention. Claims 3-11 have been cancelled. Claim 12 has been amended to depend from amended claim 1. Claim 13-15 are cancelled.

### Claims Rejection Under 35 USC-102

3. *Ng discloses bridge for attaching auxiliary lenses which comprises a primary lens assembly 32 comprising a primary bridge 34 attached between primary lenses, an auxiliary lens assembly comprising 20, an auxiliary bridge 60 attached between auxiliary lenses 50, and the flange 36 on the front of the primary bridge, the auxiliary bridge 60 having an expandable clip (upper projection 62 and lower projection 64); and, whereas the clip of the auxiliary bridge 60 is expandable to engage the bridge of the primary bridge 34, further comprising: a leg portion 44 attached to each primary lens; a flange 36 on the front of the primary bridge 34, and whereas the clip is expandable onto the flange whereas the flange 36 is locatable in the clip in a complimentary fit of their respective cross-section perimeters, a profusion 66 located on the auxiliary bridge, whereas the projection is a spherical segment, a projection 66 located on the auxiliary bridge, a complementary relief 40 located on the flange 36, whereas the protrusion 66 is locatable in the relief 40 when the clip is located on the flange.*

### Response to Applicant's Argument

4. *Applicant's arguments filed 2/25/05 have been fully considered but they are not persuasive.*

*Applicant argued that "By having a complimentary fit .... In order words, the present invention of Claim provides both horizontal and vertical support forces which Ng does not provide. The combination of these two forces, thus, decreases the likelihood of disengagement of when either horizontal or vertical separating forces are applied during usage." This argument is not persuasive because figures 1-4 of Ng (6,474,810) show that protrusions 66 is locatable in a relief 40 (vertical surface) and the upper and lower projections 62 and 64 being complimentary fit over the upper and the lower flange 36 respectively (horizontal surface). Ng (6,474,810) teaches that both horizontal and vertical support forces. Therefore, the claimed invention does not distinguish over the Ng (6,474,810).*

#### **APPLICANT'S RESPONSE**

Examiner recites various elements that Ng discloses. However, Examiner states that Ng discloses:

*"...whereas the flange 36 is locatable in the clip in a complimentary fit of their respective cross-section perimeters..."*

Applicant respectfully directs Examiner to the disclosure of Ng, FIG. 1, which is a side view of the invention of Ng.<sup>1</sup> This view is properly compared to Applicants FIG. 12, which is a side view of the invention of the Applicant. As shown in Applicant's FIG. 12 and as claimed by Applicant's currently amended Claim 1, neither Ng's FIG. 1 or specification disclose a complementary fit of matching radial surfaces. To the contrary, Ng specifically teaches the use of a "vertical face"<sup>2</sup> having an "interference fit" with a "...[R]earward

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<sup>1</sup> U.S. Pat. No. 6,474,810 B1; col. 3, ln. 6-7.

<sup>2</sup> U.S. Pat. No. 6,474,810 B1; col. 2, ln. 32.

auxiliary bridge face.<sup>3</sup> The distinction is manifest in the function and performance of the invention, as explained in detail in Applicant's specification, including at least, at paragraph numbers 0060 – 0062. As disclosed therein:

*"Interior radius 224 reduces potentially detrimental stress concentrations between upper panel 214 and rear panel 218, and as between lower panel 216 and rear panel 218 when clip 212 is expanded. This reduction in stress concentrations increases the life and reliability of clip 212, permitting greater expansion of clip 212, and thus greater retaining force between primary lens assembly 100 and auxiliary lens assembly 200."*<sup>4</sup>

*"...[C]urved surfaces of radiused end 124 and projection 222 provide a longer engagement surface for a smooth acceleration of upper panel 214 and lower panel 216 during expansion of clip 212."*<sup>5</sup>

The longer engagement surfaces between radiused end 124 and projection 222 are mathematically determinable as a double sine relationship. The acceleration of expansion of clip 210 is derived from the velocity of the horizontal engagement, and provides an optimized snapping engagement between the components.

In comparison, and in significant contrast, the only matching curved surfaces disclosed by Ng are in planes orthogonal to that disclosed and claimed by the Applicant. Ng discloses matching curved surfaces (38 and 70) in FIG. 2, which is a top view. Ng also discloses matching curved surfaces (62, 64 and 34) in FIG.'s 3 -5, which are rear views

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<sup>3</sup> U.S. Pat. No. 6,474,810 B1; col. 2, ln. 32-34.

<sup>4</sup> U.S. Appl. 10/767,537; Paragraph [0060]

<sup>5</sup> U.S. Appl. 10/767,537; Paragraph [0061]

and a front view respectively.<sup>6</sup> Thus understood, the focus of Applicant's invention relates to the relationship between elements in a different plane, specifically, in the plane of engagement, or the side view. Again, the functional distinction is detailed in Applicant's specification.<sup>7</sup>

Additionally, Ng discloses only an "interference fit. In engineering terms, the concepts of an "interference fit" and a "complementary fit" of the present invention are fundamentally distinct. A complementary fit defines substantially matching profiles, which is a criteria unnecessary to an interference fit, which requires only a literal *large square peg in a small round hole*, to be "tight" and interfering. In further support of the distinction, Applicant again respectfully directs Examiner's attention to FIG. 1 of Ng, in which surfaces 38 and 70 are not complementary in fit. This is clearly contrasted to surfaces of 122, 124, 222, and 224 of FIG. 12 of the Applicant's invention, in which a complementary fit is illustrated, and for which detailed support of the functional differences is found in abundance in the specification. As disclosed therein:

*"...[I]nterior radius 224 is receivable of radiused end 124 of flange 110 in complementary fit. As best seen in FIG. 12, radiused end 124 permits full complementary engagement of flange 112 within slot 220, and thus greater stability of auxiliary lens assembly 200 to primary lens assembly 100."*<sup>8</sup>

The complementary fit of these surfaces in the illustrated plane result in support forces distinct from those disclosed by Ng. As shown, the summary reference to "vertical" and

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<sup>6</sup> U.S. Pat. No. 6,474,810 B1; col. 3, ln. 10-13.

<sup>7</sup> U.S. Appl. 10/767,537; Paragraph [0060] - [0062].

<sup>8</sup> U.S. Appl. 10/767,537; Paragraph [0062].

"horizontal" forces in Ng does not eliminate the distinctions between the inventions in three dimensions.

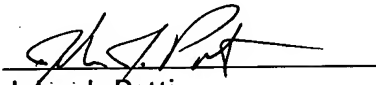
## CONCLUSION

Applicant respectfully submits that the amendments made remove the only stated grounds for rejection and objection of the Applicant's claims. Applicant respectfully submits that this invention is patentable over the prior art, and consideration of this application and its early allowance are requested.

Applicant(s) do(es) not believe that any fees are due; however, in the event that any fees are due, the Commissioner is hereby authorized to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account 50-2180 of Storm LLP.

Respectfully submitted

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